## IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA

Alexandria Division

JAMES GHAISAR, KELARA GHAISAR, and NEGEEN GHAISAR, on behalf of their deceased son and brother, BIJAN C. GHAISAR.

Civil Action No. 1:18-cv-00954-TSE-MSN

Plaintiffs,

v.

UNITED STATES OF AMERICA and JOHN DOES 1-10,

Defendants.

## NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

Pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, please take notice that Plaintiffs James Ghaisar, Kelara Ghaisar, and Negeen Ghaisar voluntarily dismiss this action against Defendants United States of American and John Does 1-10 without prejudice. Voluntary dismissal pursuant to Rule 41(a)(1)(A)(i) is appropriate at this time because Defendants have not yet filed either an answer or motion for summary judgment.

Dated: October 15, 2018 Respectfully submitted,

/s/ Thomas G. Connolly

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Counsel for Plaintiffs

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 15, 2018, copy of the above and foregoing *Notice* was served on counsel for Defendants via the Court's CM/ECF system.

/s/ Thomas G. Connolly
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